



November 23, 2009

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**RE: In the Matter of A National Broadband Plan
GN Docket No. 09-51**

Dear Ms. Dortch:

On October 29, 2009, Stephen Balkam, CEO of the Family Online Safety Institute ("FOSI"), and Kim Scardino met with Elise Kohn, Jennifer Flynn and Jessica Strott to discuss FOSI's Broadband Responsibility Awareness Campaign ("BRAC").

FOSI explained that online safety and digital citizenship are critical components to increasing and sustaining broadband deployment and adoption and therefore should be incorporated into the FCC's National Broadband Plan. FOSI presented an overview of BRAC, which is attached hereto.

During the discussion, FOSI explained that there is information to suggest that the safer people feel online, the more they use broadband. The FCC's National Broadband Plan team members requested that FOSI follow up with research to prove this point, as well as information on whether people react differently to broadband usage depending on demographics.

As the attached information explains, there is evidence to suggest that kids are going online at a younger age, because there are safe websites designed specifically for kids. Moreover, Pew's research explains that broadband usage does vary by age, education and race.

Please do not hesitate to contact me at 202-487-7552 if you have any questions.

Sincerely,

/s/
Kim Scardino
Director, Policy & Development
Family Online Safety Institute
202-487-7552
kscardino@fosi.org

cc: Elise Kohn
Jennifer Flynn
Jessica Strott



The Family Online Safety Institute (FOSI) is an International, non-profit membership organization working to make the online world safer for kids and their families by identifying and promoting best practice, tools and methods in the field of online safety, that also respect free expression.

FOSI believes that online safety and digital citizenship are critical components to increasing and sustaining broadband deployment and adoption and therefore should be incorporated into programs aimed at those goals.

- President Obama has called for an “era of responsibility,” and online safety education is critical to achieving this goal as it relates to increased broadband deployment and adoption. This includes informing the public on how to stay safe on the Internet through digital and media literacy and educational programs that teach citizens how to minimize online risk and maximize their personal safety.
- There is a major effort underway from governments, non-profits and industry alike to connect the next billion consumers around the world to the Internet. While connecting these consumers is of utmost importance, it is equally important that we be helping these consumers to be good “digital citizens”. In conjunction with the efforts to connect them online, we should be simultaneously educating about how to navigate the Internet safely and responsibly.
- It is undisputed that if people feel comfortable using the Internet, they will incorporate it into their daily lives. Thus, it follows that when consumers properly understand the appropriate guidelines for responsible Internet use and feel safe and secure online, broadband adoption rates will increase.
- The National Broadband Plan provides an opportunity for government leadership in advancing online safety education and awareness. The plan should include a responsibility component, encompassing everything from Internet safety to media literacy to digital citizenship.
- In addition, the National Telecommunications and Information Administration should allocate grants to education initiatives designed to teach digital citizenship. Educating consumers about how to stay safe while engaging in online activities must be a fundamental component of any effort to increase broadband adoption rates and to ensure that new users and existing users alike continue to stay online.

For the above reasons, FOSI is introducing a Broadband Responsibility Awareness Campaign (BRAC), an effort to unify key players in the online safety space, best practices and online safety tools with those who provide broadband to consumers.

The purpose of the Broadband Responsibility Awareness Campaign is to join the message of online responsibility with broadband adoption efforts by informing and educating the public about

responsible broadband use and raising awareness of “digital citizenship” as a necessary component to broadband adoption. This will be done by bringing together existing resources in addition to developing a national education program that promotes “digital citizenship”. Additionally, FOSI strives to convene all available information regarding tools, products and materials for online safety, media literacy and digital citizenship education and share that information with those who connect people to broadband as new and existing consumers go online.

FOSI believes there are three avenues through which broadband responsibility messages can be developed:

- 1) Tools – Working with industry to develop the tools that are necessary to help consumers manage technology safely.
- 2) Rules – Having smart public policies that encourage online safety education and allow industry to take the lead in creating tools for consumers to manage their online experience safely.
- 3) Schools - Bringing online safety into the teaching methods and curriculum that is in schools. Online safety should be as much a part of K-12 curriculum as math and reading.

FOSI believes introducing responsibility as a component of broadband adoption and use will require the combined efforts of government, law enforcement, industry, teachers, parents and kids. As new homes are connected to broadband, we need to build a ‘Culture of Responsibility’ on the web where these actors all take a responsible role in making the Internet safer. FOSI’s Broadband Responsibility Awareness Campaign seeks to bring all of these players together, working towards a safer online world.

Supplemental Information on Broadband Use

Do people fear going online?

- “F-Secure Survey Finds People Still Insecure Online”
Press Release, F-Secure Corporation
March 5, 2009
http://www.f-secure.com/en_EMEA/about-us/pressroom/news/2009/fs_news_20090305_01_eng.html
“At the core of F-Secure’s ‘Online Wellbeing’ is family security when using the Internet. Parents are increasingly worried about their children not being protected from unsuitable content including pornography and violent imagery. When asked the question, ‘My kids are safe when they are online,’ more than a third of respondents across all countries could neither agree nor disagree with the statement. Parents and guardians do not know whether children are safe online or not. The vast majority (54%) of respondents did not agree that their children were safe online.”

Kids are going online at an earlier age because of safe sites.

- “Designing An Internet For Kids” by John D. Sutter
By John D. Sutter
CNN
August 17, 2009
<http://edition.cnn.com/2009/TECH/08/17/youtube.kids.zuitube.internet/index.html>
“More kids than ever are roaming around the Internet. Kids ages 2 to 11 make up nearly 10 percent of all online users; that’s 16 million people, or 18 percent more than five years ago, according to a report from Nielsen Online... Enter a host of products -- from Web sites and browsers to parental filters and search-tracking software -- designed to help parents make the Web safer for young children.”
- “Afraid Web-Surfing Kids Will Meet Sharks? These Sites Screen Videos”
By Edward C. Baig
USA Today
August 13, 2009
http://www.usatoday.com/printedition/money/20090813/baig13_st.art.htm?loc=interstitialskip
“There are tons of great videos for your kids to watch on the Internet -- and plenty that are totally inappropriate. Even Mom and Dad may initially have trouble determining which is which. Two video sites my children and I have been testing -- ZuiTube and Totlol -- can keep the small ones entertained while removing worry for parents.”
- “Web Video For Children (Parental Guidance Advised)”
By Warren Buckleitner
The New York Times

October 8, 2009

<http://www.nytimes.com/2009/10/08/technology/personaltech/08basics.html>

“For parents who grew up with only a few television channels, the idea of turning a curious child loose with such a vast amount of content can produce a fair amount of anxiety.”

“Parents and teachers are discovering YouTube’s potential for exposing children to new ideas. Children can learn how to carve a pumpkin or improve their sketching skills. But it can just as easily expose them to videos of births, surgeries, corpses and executions -- all things conscientious parents might prefer their children discover at a later age.”

“Letting a child stumble at random into something as vast as YouTube can be akin to letting them explore a public park unsupervised. It can be enlightening, but it’s wise to stay a few steps ahead of your child’s curiosity and make discoveries together. Consider it an essential parenting skill for the 21st century.”

Demographic information about broadband usage.

➤ “The Broadband Adoption Dilemma”

By Marguerite Reardon

news.cnet.com

October 21, 2009

http://news.cnet.com/8301-30686_3-10380506-266.html

“The FCC’s status report suggests that adoption rates vary by age, income, education, and race.”

“Age appears to be one factor in broadband adoption. Only 30 percent of people 65 or older use broadband compared with about 77 percent of people who are between the ages of 19 and 29 years old, according to a Pew Internet and American Life Project survey published in June.”

➤ Home Broadband Adoption 2009

By John Horrigan

Pew Internet & American Life Project

June 2009

<http://www.pewinternet.org/~media/Files/Reports/2009/Home-Broadband-Adoption-2009.pdf>

Pew Internet cited 5 negative barriers to broadband adoption:

- Having less than a high school degree
- Senior citizen (age 65 or over)
- Living in rural America
- Having a high school degree
- African American (non-Hispanic)

➤ “Adults on Social Network Sites, 2005-2009”

By Amanda Lenhart

Pew Internet & American Life Project

October 8, 2009

<http://www.pewinternet.org/Infographics/Growth-in-Adult-SNS-Use-20052009.aspx>

“79% of American adults used the Internet in 2009, up from 67% in February 2005.”

“46% of online American adults 18 and older use a social networking site like MySpace, Facebook or LinkedIn, up from 8% in February 2005.”

“As of August 2009, Facebook was the most popular online social network for American adults 18 and older.”

➤ “Web Usability And Age: How Design Changes Can Improve Performance”

By Ann Chadwick-Dias, Michelle McNulty & Tom Tullis

Fidelity Investments

Fidelity Center for Applied Technology, Human Interface Design

November 3, 2009

http://www.bentley.edu/events/agingbydesign2004/presentations/tedesco_chadwickdias_tullis_webusabilityandage.pdf

“Older adults most likely experience lower usability because of a myriad of contributing factors including social, cognitive, psychological, and physical factors as well as overall differences in life experience (i.e., not using the Internet at school or work).”

➤ “Are ‘Wired Seniors’ Sitting Ducks?”

Data Memo: Findings

Pew Internet & American Life Project

April 2006

<http://www.pewinternet.org/Reports/2006/Are-Wired-Seniors-Sitting-Ducks.aspx?r=1>

“The common perception of the timid older internet user is quite accurate, even for relative newcomers to the ranks of seniors. Wired seniors are less likely than internet users under the age of 65 to have tried a wide range of online activities, possibly because they are not in the market for as many types of information as younger users who might be doing schoolwork, trolling for dates, or scanning employment listings online.”

“In addition, researchers at Fidelity Investments have identified ‘cautious clicking’ as a behavior trait of many older internet users who may share a sense that one false move on the Web could land them in unknown or unsafe territory.”

➤ “The Power of the Hispanic Consumer Online”

Scarborough Research

March 19, 2009

http://www.scarborough.com/press_releases/The%20Power%20of%20the%20Hispanic%20Consumer%20Online%20FINAL%203.19.09%20A.pdf

“In fact, Internet access among Hispanics has been increasing at a faster rate than it has among total adults in the U.S.”

“Hispanic Internet access has grown 13% (on a relative basis) since 2004 - from 48% in 2004 to its current penetration of 54% (as noted above). By contrast, Internet access by all

consumers nationally grew 8% during the same time period. In 2004, 64% of all consumers accessed the Internet, and this increased to 69% in 2008.”

“Currently, 68% of Hispanic Internet users have a broadband connection in their household. This grew from 13% in 2002 – an increase of more than fivefold.”

- “The Substantial Consumer Benefits Of Broadband Connectivity For U.S. Households”
By Mark Dutz, Jonathan Orszag and Robert Willig
Compass Lexecon
Commissioned by the Internet Innovation Alliance
July 2009
http://internetinnovation.org/files/special-reports/CONSUMER_BENEFITS_OF_BROADBAND.pdf
“Among all households in 2008 (including those off-line): 82 percent of Asian households were connected to broadband, while only 57 percent of black/African-American households had adopted it.”
- “Mobile Internet Use Shrinks Digital Divide”
Posted By Jenna Wortham
The New York Times Bits Blog
July 22, 2009
<http://bits.blogs.nytimes.com/2009/07/22/mobile-internet-use-shrinks-digital-divide>
“Not only are African-Americans the most active users of mobile Internet, they are also the fastest growing group to adopt the technology: the percentage of African-Americans using mobile phones or another type of connected gadget to share e-mail, exchange instant messages and access the Internet for information on an average day has more than doubled since late 2007, jumping to 29 percent, from 12 percent.”
- Wireless Internet Use
By John Horrigan
Pew Internet & American Life Project
July 22, 2009
<http://www.pewinternet.org/Reports/2009/12-Wireless-Internet-Use.aspx?r=1>
“By a 59% To 45% margin, white Americans are more likely to go online using a computer on a typical day than African Americans.”

“When mobile devices are included in the mix, the gap is cut in half; 61% of whites go online on the average day when mobile access is included while 54% of African Americans do.”

“29% Of African Americans use the Internet on their handheld on an average day, also about half again the national average of 19.”

“African Americans are the most active users of the mobile internet – and their use of it is also growing the fastest. This means the digital divide between African Americans and white Americans diminishes when mobile use is taken into account.”

➤ Home Broadband Adoption 2009

By John Horrigan

Pew Internet & American Life Project

June 2009

<http://www.pewinternet.org/~media/Files/Reports/2009/Home-Broadband-Adoption-2009.pdf>

“Two groups of low-income Americans saw strong broadband growth from 2008 to 2009.

- Respondents living in households whose annual household income is \$20,000 or less, saw broadband adoption grow from 25% in 2008 to 35% in 2009.
- Respondents living in households whose annual incomes are between \$20,000 and \$30,000 annually experienced a growth in broadband penetration from 42% to 53%.

Overall, respondents reporting that they live in homes with annual household incomes below \$30,000 experienced a 34% growth in home broadband adoption from 2008 to 2009.”

“When explicitly asked what would move them from the dial-up to broadband column, dial-up users haven’t changed much in their perspectives on this question since 2008. Although a plurality cite price as the reason, some two-thirds of dial-up users cite a range of other things that would have to change to get them to switch. Some reasons cited are fairly precise, such as availability of service, while others are vague, such as simply not wanting to switch or not being able to identify something specific.”